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 Oregon State Penitentiary
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Attorney Appearing Pro Se Litigant :

IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF OREGON

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GINES DENNIS, ,

Plaintiff,

Vs.

OREGON DEPARTMENT OF
 CORRECTIONS (ODOC), a political
 subdivision in charge of the Oregon State
 Penitentiary (OSP), COLETTE PETERS,
 Director (ODOC); BRANDON KELLY,
 Superintendent, OSP; JEFF PREMO,
 Superintendent OSP; KEITH DAVIS, OSP
 Food Services Manager; RICHARD RIDDERBUSCH,
 OSP Assistant Food Services Manager; DIGIVLIO, C.
 Medical Director of (ODOC); CARRIE COFFEY OSP
 Health Services Manager; JULIE McCRAE,OSP
 Health Nurse; BRENDA MAGEE, OSP Health
 Services Nurse Manager; OREGON STATE BOARD
 OF NURSING (OSBN) a political subdivision of
 the executive branch of the State of Oregon;
 GAVENAN KATE BRANIN OSBN Director;
 ROBERTA POOLE,OSBN Complaint
 Intake Coordinator, UNKOWN DEFNDANT'S,
 WHO AT THE TIME WAS INVOLVED BUT
 WAS UNABLE TO OBTAIN THIER NAMES.

Defendant's.

Case No. 6:17 – CV – 00841- SI :
 Honorable : Michael H. Simon :
 United States District Judge.

JURY TRIAL IS DEMANDED

42. U.S.C. § 1983:

PLAINTTIFS- MOTION FOR REPLY TO DEFENDANT'SMOTION FOR SUMMARYJUDGMENT

- under the rules provided under federal rules of civil procedure's, this plaintiff is requesting that the courts enter an order in favor of plaintiff, under the color of the law as to the rules and policy's ,are clear, and under facts of records by both party's in defendant's responses from the

Defendant's state issue's clear in support of this Plaintiff and how can you not agree that the rules were not followed under the Oregon Administrative Rules in OAR: 291: as Department of Corrections staff has to follow in context to the writing such and they have no out side the line authority in order to do so or under Oregon Civil Litigation Laws are subjected to Punishment under them as Individuals , not supported by the State in an Tort or Civil Action IF filed , as the Records shows that The state Police were requested to step in and see about the issues, as an Result, she no longer Works Here. In-support of this Action of an (1983), for Violations against this Party, this Plaintiff ,

1st-Compensation for Damages – Injury's Done :
2 nd – Compensation for Punitive Damages Done :
3rd-Compensation for Deliberate Indifference of Prison Official's for which Damages could of been more limited if Prison Staff would of Followed the Rules and Policies in Division 291-under The Department of Corrections Rules and Policies.
4th- Permanent Injunction Relief for Changes of not follow Standard Procedures for Issue of Conditions of Work areas as Proscribed By the Rules out Lined In The Department of Corrections Kitchen Work Areas Qualification See OAR: 291-061- Division:

Under the Above in Incorporated with all stated Documents if you would read the Declarations done in support of The Defendant's as shown that stated Plaintiff is correct in is issues and this should of never happened. As this action would be just on completion of The Court issuing Orders to The Department of Corrections Employees to address this issue and see to The Acts Requested as also requested in The Paying of Court Costs and Litigation , and Attorney Fees if Party's Wish to Go to Trial . This Plaintiff Requests that you The Courts Issue in Favor of This Plaintiff and Award Issues Requested in this Action so as to change issues from Occurring Again as this Court Records Shows This Is Not The Only Case That Was Presented Under Theses Similar Issues.

In-closed Documents in Support of, .

Respectively Submitted by, Dennis Jones.

Dated on This Date of, 12-20-18.